

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BALTIMORE DIVISION

JASON ALFORD, DANIEL LOPER, WILLIS
MCGAHEE, MICHAEL MCKENZIE, JAMIZE
OLAWALE, ALEX PARSONS, ERIC SMITH,
CHARLES SIMS, JOEY THOMAS, and LANCE
ZENO, Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY & SURVIVOR
BENEFIT PLAN; THE NFL PLAYER
DISABILITY & NEUROCOGNITIVE BENEFIT
PLAN; THE BERT BELL/PETE ROZELLE NFL
PLAYER RETIREMENT PLAN; THE
DISABILITY BOARD OF THE NFL PLAYER
DISABILITY & NEUROCOGNITIVE BENEFIT
PLAN; LARRY FERAZANI; JACOB FRANK;
BELINDA LERNER; SAM MCCULLUM;
ROBERT SMITH; HOBY BRENNER; and
ROGER GOODELL,

Defendants.

Case No. 1:23-cv-00358-JRR

**DECLARATION OF CHRISTOPHER A. SEEGER IN SUPPORT
OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

CHRISTOPHER A. SEEGER declares the following pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Seeger Weiss LLP and am admitted to practice in the States of New York and New Jersey. I am admitted to this Court *pro hac vice* pursuant to the Court's Order dated February 10, 2023 (ECF No. 4). I make this Declaration in support of Plaintiffs' motion for class certification pursuant to Rule 23 of the Federal Rules of Civil Procedure. I have personal knowledge of the matters set forth herein based on my role as counsel

of record and my review of the case file and other files of my firm.

2. Annexed hereto as **Exhibit A** is the firm biography of Seeger Weiss LLP.
3. Annexed hereto as **Exhibit B** is the firm biography of Athlaw LLP.
4. Annexed hereto as **Exhibit C** is the firm biography of Aylstock, Witkin, Kreis, & Overholtz, PLLC.
5. Annexed hereto as **Exhibit D** is an unpublished and not publicly docketed Settlement Implementation Determination issued by the Honorable Anita B. Brody on September 3, 2020 in *In re National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323-AB (E.D. Pa.), overruling the objection of the National Football League and sustaining the Special Master's ruling that the settlement class member (identified by SPID [i.e., Settlement Program ID] No. 100015138), who was represented by Athlaw LLP, was entitled to a Monetary Award under the settlement program established pursuant to the class action settlement in that multidistrict litigation.
6. Annexed hereto as **Exhibit E** is the firm biography of Migliaccio & Rathod LLP.
7. Under penalty of perjury, I declare the foregoing to be true and correct.

Executed this 3rd day of September, 2024

s/ Christopher A. Seeger
CHRISTOPHER A. SEEGER